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## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91237315
Party	Defendant Universal Life Church Monastery Storehouse, Inc.
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Date	08/25/2021
Attachments	G. Yoshioka Transcript & Exs. 120720.pdf(3960635 bytes)

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

AMERICAN MARRIAGE MINISTRIES,	)
Opposer,	)
vs.	) Opposition No. ) 91237315
UNIVERSAL LIFE CHURCH MONASTERY STOREHOUSE, INC.,	)
Applicant.	)

Testimony Upon Oral Examination Of GLEN YOSHIOKA

> 1:10 p.m. December 7, 2020

Deposition held via videoconference. All parties attended remotely.

REPORTED BY: Yvonne A. Gillette, RPR, CCR No. 2129.

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3	By Mr. Matesky	4 - 50
4	By Mr. Hodges	50 - 51
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11	E X H I B I T I N D E X	
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Page 4 GLEN YOSHIOKA, being duly sworn, testified 1 2 upon oath as follows: 3 4 MR. MATESKY: Just for the record again, just like this morning, Ben, if we could just agree on 5 6 the record that we -- parties waive any objections to 7 the deposition occurring via Zoom, via video 8 conference as opposed to in person? MR. HODGES: Agreed. 9 10 EXAMINATION BY MR. MATESKY: 11 Mr. Yoshioka, I'm the attorney for Universal 12 Life Church Monastery Storehouse, the applicant in 13 this matter. Is that clear to you? 14 15 Α Yes. If I say ULC Monastery, will you understand 16 17 that I'm referring to the applicant in this matter? 18 Α Yes. And if I say AMM, will you understand that 19 20 I'm referring to American Marriage Ministries, the opposer in this matter? 21 22 Α Yes. 23 Do you understand that you are under oath, and your responses are given today under penalty of 24 25 perjury?

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- 1 A Yes.
- 2 Q Although there's no judge or jury present,
- 3 do you understand that this is sworn testimony to be
- 4 presented to the Trademark Trial and Appeal Board in
- 5 this matter?
- 6 A Yes.
- 7 Q As the court reporter mentioned, it's
- 8 important for us to take our time, speak slowly and
- 9 clearly, and not speak over each other so we can get a
- 10 clear transcript. So please wait until I'm finished
- 11 asking my question before you answer. Is that okay?
- 12 A Yes.
- 13 Q Also your counsel may object to one or more
- 14 questions. So please take a moment before responding
- 15 to give your counsel the opportunity to object without
- one person speaking over another. Okay?
- 17 A Understood.
- 18 Q I'm going to ask that you please give verbal
- 19 responses, rather than uh-huh, huh-uh, or shaking your
- 20 head or nodding your head. Is that okay?
- 21 A Yes.
- 22 Q If you don't understand a question I ask,
- 23 will you please let me know?
- 24 A Yes.
- 25 Q And if you need to take a break at any

- 1 point, will you please let me know?
- 2 A Yes.
- 3 Q Are you under the influence of any drugs,
- 4 alcohol, or condition that would impair your ability
- 5 to give full and truthful responses today?
- 6 A No.
- 7 Q Will you please let me know if that changes
- 8 at any point in time during this deposition?
- 9 A Yes.
- 10 Q Did you do anything to prepare for your
- 11 testimony today?
- 12 A I skimmed over the transcripts from the last
- 13 deposition.
- 14 Q When you say the last deposition, which
- 15 deposition is that?
- 16 A This was the one back in September.
- 17 Q Are you referring to your deposition?
- 18 A Yes.
- 19 Q Did you review any other deposition
- 20 transcripts in preparation for your testimony today?
- 21 A No.
- 22 Q Did you do anything else to prepare for your
- 23 testimony today?
- 24 A No.
- 25 Q Did you meet with anyone or have a

- 1 conversation with anyone to prepare for your testimony
- 2 today?
- 3 A No.
- 4 Q So is it your testimony you didn't have a
- 5 call with your counsel to prepare for your testimony
- 6 today?
- 7 A I misunderstood. I assumed that that
- 8 question was excluding counsel. We did have a
- 9 meeting, or I did have a meeting with my counsel last
- 10 Friday.
- 11 Q Okay. So just to clarify, Mr. Yoshioka, I'm
- 12 going to ask that you listen to the question I ask you
- 13 and answer the question I ask you during this
- 14 deposition. Is that okay?
- 15 A Yes.
- 16 Q Okay. So to clarify, your prior response
- 17 that you did not meet or discuss with anyone to
- 18 prepare for this deposition is not accurate, correct?
- MR. HODGES: Object to form.
- 20 A My understanding was that the question
- 21 assumed that I had already spoken with my counsel.
- 22 Q Ms. Yoshioka, I asked you -- please listen
- 23 to the question I ask you and respond only to the
- 24 question I ask you.
- 25 Yvonne, would you read back my last question

- 1 to Mr. Yoshioka, please?
- 2 (Record read.)
- 3 A I misunderstood the question when it was
- 4 asked.
- 5 Q That's not an answer to my question. Can
- 6 you answer my question?
- 7 MR. HODGES: Object to form.
- 8 A My answer is that I met with my lawyers last
- 9 Friday to discuss this deposition.
- 10 Q Mr. Yoshioka, I'm not going to belabor the
- 11 point, but this deposition is going to go on much
- 12 longer than it needs to if you insist on answering
- 13 questions other than the question I ask you. I'm
- 14 going to move on, but really, it would make it easier
- for everyone if you would just answer the question
- 16 that's asked instead of coming up with an answer to
- 17 some other question.
- 18 MR. HODGES: To the extent there was a lack
- of question or anything in there, I'll object to the
- 20 form.
- 21 Q Okay. Mr. Yoshioka, I am going to draw your
- 22 attention to a document that is titled AMM Home Page
- 23 20110208. Do you see that document? I can repeat the
- 24 document number if you would like.
- 25 A Yeah. Can you please repeat that?

Page 9 Sure. So this was sent to your counsel and 1 then forwarded to you. The file name is AMM Home Page 2 3 20110208. Do you see that document? 4 Α Yes. 5 MR. MATESKY: We're going to introduce this 6 document as Exhibit 50. We're using 50, as that's intended to be a continuation of the exhibit numbering 7 8 from the previous testimony depositions of AMM 9 personnel. 10 (Exhibit No. 50 marked for identification.) 11 So take your time to review this document. 0 MR. HODGES: I'll object to the extent this 12 wasn't produced or is not a production copy without a 13 14 Bates number on it. Are you okay with making this 15 continue throughout this, or do I need to make it every time you ask a question about it? 16 17 MR. MATESKY: Let's not make it continuing just yet, but we might get that figured out and may at 18 19 some point. 20 Mr. Yoshioka, do you recognize what's shown 21 on this document? 22 Α Yes. 23 What is this document? 0 24 MR. HODGES: Same objections.

This document looks like a screenshot taken

25

Α

- 1 using the Wayback Machine of a screenshot of one of
- 2 our web pages, which I assume is from 2011, based on
- 3 the file name.
- 4 MR. MATESKY: And, Ben, I'm fine with that
- 5 objection being continuing for this exhibit.
- 6 Q Mr. Yoshioka, does this appear to be the
- 7 home page of TheAMM.org as of February 8th, 2011?
- 8 A I don't know if it's our home page.
- 9 Q I direct you to the top of page 1 in the
- 10 upper left hand corner, where it says HTTP, colon,
- 11 forward slash, forward slash, www.theamm.org, forward
- 12 slash. Do you see that?
- 13 A Yes, I see that now.
- 14 Q Does that clarify your response as to
- whether this shows TheAMM.org home page?
- 16 A Yes.
- 17 Q And just to be clear, so what is that
- 18 response with that clarification?
- 19 A This looks like a screenshot of our home
- 20 page from 2011.
- 21 Q I'll direct you to page 2 of this document.
- 22 Does page 2 of this document appear to be the same
- 23 thing with the Wayback Machine timeline removed?
- 24 A Yes.
- 25 Q Mr. Yoshioka, you were president of AMM at

- 1 this point in time, correct?
- 2 A Yes.
- 3 Q Based on your recollection, does this
- 4 document actually -- excuse me. Based on your
- 5 recollection, does this document accurately reflect
- 6 the content of TheAMM.org home page as of the stated
- 7 date?
- 8 A More or less. As you can see from this
- 9 screenshot, there are certain elements on the page
- 10 that aren't loading or displaying properly due to the
- 11 fact that it was taken retroactively through the
- 12 Wayback Machine.
- 13 Q And other than those elements, do you have
- 14 any reason to believe this document does not
- 15 accurately reflect the content of the home page of
- 16 TheAMM.org at this point in time?
- 17 A Other than that, this looks like it would
- 18 have been what this page looked like at that point in
- 19 time.
- 20 Q Okay. I am going to draw your attention to
- 21 a document that was sent to you entitled AMM Home Page
- 22 20110612. Do you have that document?
- MR. HODGES: Can you repeat that one, Mike?
- 24 I didn't get that.
- MR. MATESKY: Sure. AMM Home Page 20110612.

Page 12 MR. HODGES: Thanks. 1 2 (Exhibit No. 51 marked for identification.) 3 I am not seeing that document. Α May I ask, Mr. Yoshioka, how many documents 4 titled AMM Home Page with some number after it did you 5 6 receive? 7 I'm looking at ten attachments. Α 8 Can you see the file names of those attachments? 9 10 Yes. Α 11 So that -- you should have all of them. Let 12 me repeat the title of this document. It's AMM Home Page 20110602. 13 14 Okay. I found it. Α 15 Do you recognize this document? 16 Yes. Α 17 What is this document? MR. HODGES: And the same objection to the 18 extent that this isn't a Bates numbered document. 19 20 MR. MATESKY: Sure. And -- okay. Okay. 21 Sorry. Strike my babbling. 22 Q So, Mr. Yoshioka, do you recognize this 23 document? 24 Yes. 25 What is this document? Q

- 1 A This document looks like another screenshot
- 2 taken using the Wayback Machine of what would either
- 3 have been our home page or a splash home page back
- 4 from the date that you mentioned this document was
- 5 taken from. I guess that would have been 2011. Yeah,
- 6 2011.
- 7 Q Just to clarify -- well, I have two
- 8 follow-up questions to that. What is the distinction
- 9 between a home page and a splash home page as you were
- 10 using those terms?
- 11 A Yeah. I should define that. And I don't
- 12 know if that's a specific technical term. It was
- jargon that I've used to describe what is basically a
- 14 home page -- it's basically where you go to a web
- 15 page, and when you land on that web page, it loads
- 16 another page superimposed on top of it. For instance,
- if you go to, say, like the New York Times for
- instance, and then it pops up a box on top of the
- 19 page, that's what I was referring to. Now, I don't
- 20 know if that was that, but it looks kind of like that.
- 21 And we were experimenting with those types of
- 22 presentations at that time. So just to clarify,
- 23 that's what I meant by splash home page.
- 24 Q Based on your recollection, does this
- 25 document accurately reflect what a visitor would see

- when visiting TheAMM.org as of June 12th, 2011?
- 2 MR. HODGES: Same objection as before.
- 3 MR. MATESKY: And, Ben, your objection can
- 4 stand for this exhibit. And, Glen, would you mind
- 5 repeating your answer to my question because I believe
- 6 I spoke over you.
- 7 A Yes.
- 8 Q Thank you. Does page 2 of this document
- 9 appear to be the same as page 1 with the Wayback
- 10 Machine timeline removed?
- 11 A Yes.
- 12 Q If someone wanted to submit an application
- 13 to join AMM as a minister, is there a link on this
- 14 page that would direct them to on an online
- 15 application?
- 16 A Yes.
- 17 Q Where is that link?
- 18 A That link is in the middle -- well, that
- 19 link is the one that's the golden button that says,
- 20 begin ordination.
- 21 Q Okay. I'm going to direct your attention to
- 22 another document that was sent to you. It's titled
- 23 AMM Home Page 20140520. Do you have that document?
- 24 A Yes.
- 25 Q We're introducing this document as Exhibit

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- 1 52.
- 2 (Exhibit No. 52 marked for identification.)
- 3 Q Do you recognize this document?
- 4 MR. HODGES: Same objections before as to
- 5 Bates numbers.
- 6 A Yes.
- 7 Q And that objection can stand to the extent
- 8 of this exhibit. What is this document?
- 9 A This document looks like another screenshot
- 10 taken using the Wayback Machine of our home page
- 11 shortly after the time that Steven Colbert got
- 12 ordained with American Marriage Ministries and
- 13 promoted us on his show.
- 14 Q Does this appear to reflect the content of
- 15 TheAMM.org home page as of May 20th, 2014?
- 16 A Yes.
- 17 Q And does page 2 of this document appear to
- 18 be the same except with the Wayback Machine timeline
- 19 removed?
- 20 A Yes.
- 21 Q And if someone wanted to submit an
- 22 application to join AMM as a minister, is there a link
- 23 on this page that would direct them to an online
- 24 application?
- 25 A Yes.

- 1 Q Where is that link?
- 2 A It is the same as I said in my last
- 3 response. It is the gold button that says, begin
- 4 ordination that is in the middle of the page.
- 5 Q Okay. I will now direct your attention to
- 6 another document. The file name for this document is
- 7 AMM Home Page 20140625. Do you have that document?
- 8 A Yes.
- 9 Q Do you recognize this document?
- 10 MR. HODGES: Same objection as before.
- MR. MATESKY: And that objection can stand
- 12 to the extent we're discussing this exhibit.
- 13 A Yes.
- MR. MATESKY: And before I forget, we're
- introducing this document as Exhibit 53, I believe.
- 16 (Exhibit No. 53 marked for identification.)
- 17 Q What is this document?
- 18 A This document looks like another screenshot
- 19 taken using the Wayback Machine of our home page as of
- 20 the date referenced in the document's name. I guess
- 21 that would have been on June 25th of 2014.
- 22 Q And does this document appear to accurately
- 23 reflect the content of the home page for TheAMM.org as
- 24 of June 25th, 2014?
- 25 A Yes.

- 1 Q Does page 2 of this document appear to be
- 2 the same as page 1 except with the Wayback Machine
- 3 timeline removed?
- 4 A Yes.
- 5 Q If someone wanted to submit an application
- 6 to join AMM as a minister, is there a button or link
- 7 on this page that would direct them to an online
- 8 application?
- 9 A Yes.
- 10 Q Where is that button or link?
- 11 A There are actually two. There is one near
- 12 the top of the page in the middle where it says, apply
- 13 for ordination. And there's another one at the bottom
- of the page above the footer, where it also says,
- 15 apply for ordination.
- 16 Q And I'll direct you to the second page of
- 17 this document as well. Do you see where it says,
- 18 apply for ordination in the header?
- 19 A Yes.
- 20 Q Would that also serve as a link to take a
- 21 visitor to an online application to join AMM as a
- 22 minister?
- 23 A Yes.
- 24 Q I'm going to direct your attention to a
- document file named AMM Application 20140625.

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- 1 A I see that.
- 2 Q And if my audio is not great, I do have some
- 3 headphones I can wear. That might be better. If it's
- 4 a continuing problem, please let me know.
- 5 A I appreciate that.
- 6 Q We're introducing this document as Exhibit
- 7 54.
- 8 (Exhibit No. 54 marked for identification.)
- 9 MR. HODGES: Same objection as before.
- MR. MATESKY: And that objection can stand
- 11 for this exhibit.
- 12 Q What is this document, Mr. Yoshioka?
- 13 A This looks like another screenshot taken
- 14 using the Wayback Machine of our home page as it would
- 15 have appeared back in June of 2014.
- 16 Q I'll direct your attention to the upper left
- 17 hand corner of the first page of this document. Do
- 18 you see the URL stated there?
- 19 A Yes.
- 20 Q Does that refresh your recollection about
- 21 what this document shows?
- 22 A Yes.
- 23 Q So what do you think this document shows?
- 24 A This document shows a screenshot of the AMM
- 25 home page back from 2014. What do you consider the

- 1 home page to refer to? Let me strike that question.
- 2 Q Is this the first page a visitor would see
- 3 as of this timeframe when visiting TheAMM.org?
- 4 A Yes.
- 5 Q Okay. I will direct your attention back to
- 6 Exhibit 53, which is a document titled AMM Home Page
- 7 20140625. Was it not your testimony that this
- 8 document shows the AMM home page -- excuse me. Was it
- 9 not your testimony that this document shows the home
- 10 page of TheAMM.org as of June 25th, 2014?
- MR. HODGES: Object to form.
- 12 A I do not recall either stating that or being
- 13 shown this specific screenshot as a piece of evidence.
- 14 Could you clarify what you may have thought I said?
- 15 O Yeah. Let me review the documents real
- 16 quick to make sure I'm asking the right questions
- 17 about the right documents. Actually, could we go off
- 18 the record for a moment?
- 19 (Recess taken.)
- 20 Q Mr. Yoshioka, I want to make sure both you
- 21 and I are clear on which documents and exhibits we're
- 22 referring to. So I'm going to call your attention to
- 23 Exhibit 53, which is the file titled AMM Home Page
- 24 20140625. Do you have document?
- 25 A Yes, I am -- I just opened it.

- 1 Q I'm hopefully not retreading ground we've
- 2 already covered, but just to make sure we're on the
- 3 same page, do you recognize this document?
- 4 A Yes.
- 5 O And what is this document?
- 6 A This document looks like a screenshot of
- 7 The AMM.org home page using the Wayback Machine as of
- 8 June of 2014.
- 9 Q And does page 2 of this document appear to
- 10 be the same as page 1 except with the Wayback Machine
- 11 timeline removed?
- 12 A Yes.
- 13 Q And does this document appear to accurately
- 14 reflect the content of TheAMM.org home page as of June
- 15 25th, 2014?
- 16 A Yes.
- 17 Q If someone wanted to submit an application
- 18 to join AMM as a minister, are there links on this
- 19 page that would direct them to an online application?
- 20 A Yes.
- 21 O Where are those links?
- 22 A There is a button on the first page that's
- 23 blue with a gold border that says, apply for
- 24 ordination. And there is another button at -- further
- down the page that's also gold on a dark blue

- 1 background that also says, apply for ordination.
- 2 Q And is there another link that would direct
- 3 a visitor to the same online application?
- 4 A Yes. And -- okay. It was covered up by the
- 5 Wayback Machine, so I didn't see it. But on the
- 6 second one, there's also a link in the main navigation
- 7 as well that says, apply for ordination.
- 8 Q Okay. So now to direct your attention to a
- 9 document that is entitled AMM Application 20140625.
- 10 Do you have that document?
- 11 A Yes.
- 12 Q And I believe this document has already been
- introduced as Exhibit 54. If not, we're reintroducing
- 14 this document as Exhibit 54.
- Do you see the URL in the upper left hand
- 16 corner of the first page of this document?
- 17 A Yes.
- 18 O What is that URL?
- 19 A That URL is TheAMM.org, back slash,
- 20 ordination application.
- 21 Q Do you recognize this document?
- 22 A Yes.
- 23 Q What is this document?
- 24 A This document looks like a screenshot using
- 25 the Wayback Machine of the AMM's ordination

, . . .

- 1 application from June 25th, 2014.
- 2 Q And does page 2 of this document appear to
- 3 be the same as page 1, except with the Wayback Machine
- 4 timeline removed?
- 5 A Yes.
- 6 Q Does this document appear to accurately
- 7 reflect the AMM ordination application as of June
- 8 25th, 2014?
- 9 A Yes.
- 10 Q Is this the page a visitor would see if he
- or she clicked on the "apply for ordination" button on
- 12 TheAMM.org home page shown in Exhibit 53?
- 13 A Yes.
- 14 O If a user filled out this form and clicked
- 15 the submit application button towards the bottom of
- 16 the page, was there anything else he or she needed to
- do to become an AMM minister?
- 18 A I don't know. I don't think so. And the
- 19 reason I'm responding this way is because, during
- 20 certain points of our history, we also used an email
- 21 validation as well where you would have to confirm
- 22 your account after submitting the application. I
- 23 don't know if we were doing it at this time. But
- 24 essentially, the simple answer is yes, that once
- 25 someone properly submits that application, they would

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- 1 become an AMM minister.
- 2 Q I'm going to now draw your attention to a
- 3 document titled AMM Store 20140625. Do you have that?
- 4 A Yes.
- 5 Q Do you recognize this document?
- 6 A Yes.
- 7 O What is this document?
- 8 MR. HODGES: Mike, same objections as
- 9 before.
- 10 MR. MATESKY: Okay. Those objections can
- 11 stand for this exhibit.
- 12 A This document looks like a screenshot taken
- 13 using the Wayback Machine of TheAMM.org store index
- 14 from June 25th, 2014.
- Just to clarify, does this document appear
- 16 to reflect the page available at TheAMM.org/store as
- 17 of June 25th, 2014?
- 18 A Yes.
- 19 Q And does page 2 appear to be the same as
- 20 page 1 with the Wayback Machine timeline removed?
- 21 A Yes.
- 22 Q Based on your recollection, does this
- 23 document accurately reflect the content of
- 24 TheAMM.org/store page as of the stated date?
- 25 A Yes.

- 1 Q I am going to draw your attention to a
- 2 document -- sorry. I don't know if I properly
- 3 identified that the document we were just looking at
- 4 should be introduced as Exhibit 55, I believe.
- 5 (Exhibit No. 55 marked for identification.)
- 6 Q Now I'm going to draw your attention to a
- 7 document titled AMM Home Page 20150314. Do you see
- 8 that?
- 9 (Exhibit No. 56 marked for identification.)
- 10 A Yes.
- 11 Q Do you recognize this document?
- MR. HODGES: Same objections on our part,
- 13 Mike.
- 14 MR. MATESKY: That objection can stand for
- 15 this exhibit.
- 16 A Yes.
- 17 Q What is this document?
- 18 A This document looks like a screenshot of our
- ordination application taken using the Wayback Machine
- 20 on March 14th of 2015.
- 21 Q Does this appear to reflect
- 22 TheAMM.org/ordination-application page as of March
- 23 14th, 2015?
- 24 A Could you repeat that question? You cut out
- 25 for a second there.

Page 25 You know what, could we go off the record 1 2 just for 15 seconds maybe. (Pause in proceedings.) 3 (Last question read.) 4 5 Α Yes. 6 And does page 2 of this document appear to 7 be the same page with the Wayback Machine timeline 8 removed? 9 Α Yes. Based on your recollection, does this 10 document accurately reflect the content of 11 The AMM.org/ordination-application page as of March 12 14th, 2015? 13 14 Α Yes. If a user filled out this form and clicked 15 the submit application button, was there anything else 16 17 he or she needed to do to become an AMM minister? As I stated before, unless we had an email 18 validation implemented at the time, then this would 19 20 have been -- the answer to that is yes. 21 I'm sorry. Is the answer that there is an 0 22 additional step that would need to be completed? 23 I apologize. I misspoke. I meant to say that, no, other -- so, yes, once someone completes 24 this application and it's submitted with accurate 25

- 1 information, they would then be an AMM minister.
- 2 Q I'm going to need to send you an additional
- 3 document, but I'll get through the ones I've already
- 4 sent first. I will draw your attention to a document
- 5 titled AMM Store 20160402. Do you have that document?
- 6 A Yes.
- 7 O We will introduce that document as Exhibit
- 8 57. Do you recognize this document?
- 9 (Exhibit No. 57 marked for identification.)
- 10 A Yes.
- 11 Q What is this document?
- 12 A This document looks like a screenshot of
- 13 TheAMM.org/store, which is our store index as of April
- 14 2nd of 2016.
- 15 Q And does page 2 of this document appear to
- 16 be the same, except with the Wayback Machine timeline
- 17 removed?
- 18 MR. HODGES: Objection to the extent -- same
- 19 objection as before to the Bates numbers.
- MR. MATESKY: And that objection can stand
- 21 for this exhibit.
- 22 A Yes, with the exception that there's some
- 23 design stuff that looks weird. But I believe that's
- 24 because of the Wayback Machine. Other than that, all
- 25 of the content looks like it would have been as it was

- 1 as of that date.
- 2 Q I am now going to draw your attention to a
- 3 document titled AMM Home Page 20180104.
- 4 THE COURT REPORTER: Counsel, did you want
- 5 the last document marked as number 56?
- 6 MR. MATESKY: I believe the last one should
- 7 have been 57. I thought I mentioned that. Could we
- 8 double check that we've got the exhibit numbering
- 9 correct.
- 10 (Discussion held off the record.)
- 11 Q So Mr. Yoshioka, do you have the document
- with the file name AMM Home Page 20180104?
- 13 A Yes.
- MR. MATESKY: We are introducing that
- 15 document as Exhibit 58.
- 16 (Exhibit No. 58 marked for identification.)
- 17 MR. HODGES: Same objections as before.
- 18 MR. MATESKY: Those objections can stand for
- 19 this exhibit.
- 20 Q Do you recognize this document?
- 21 A Yes.
- 22 0 What is this document?
- 23 A This looks like a screenshot using the
- 24 Wayback Machine of TheAMM.org's home page from January
- 25 4th, 2018.

- 1 Q And based on your recollection, does this
- 2 appear to accurately reflect the content of the home
- 3 page for TheAMM.org as of January 4th, 2018?
- 4 A Yes.
- 5 Q And does page 2 of this document appear to
- 6 be the same as page 1 but with the Wayback Machine
- 7 timeline removed?
- 8 A Yes.
- 9 Q If someone wanted to submit an application
- 10 to join AMM as a minister, are there links or buttons
- on this page that would direct them to an online
- 12 application?
- 13 A Yes.
- 14 Q Where are they?
- 15 A There are three of them. The first one is
- in the main navigation at the top of the page. The
- 17 second one is a dark blue button with gold trim in the
- 18 middle of the page that says apply for ordination.
- 19 And the last one is a gold button that says apply for
- 20 ordination that's at the bottom of the page.
- 21 Q So I need to send you and your counsel one
- 22 additional document which should not take me too long.
- 23 We can probably just go off the record, but we don't
- 24 really need to break is my thinking.
- 25 (Pause in proceedings.)

Page 29 (Exhibit No. 59 marked for identification.) 1 So we're back on the record, and I have sent 2 3 a document to be introduced as Exhibit 59. Glen, do you recognize this document? 4 5 MR. HODGES: Same objections as before. 6 MR. MATESKY: And those actions can stand for this exhibit. 7 8 Α Yes. What is this document? 9 This document looks like a screenshot using 10 Α the Wayback Machine of TheAMM.org's home page as it 11 would have appeared on March 14th of 2015. 12 And based on your recollection, does this 13 accurately reflect the content of the home page for 14 15 The AMM.org as of March 14th, 2015? Yes. 16 Α 17 And does page 2 of this document appear to be the same as page 1, except with the Wayback Machine 18 timeline removed? 19 20 Α Yes. 21 If someone wanted to submit an application 22 to join AMM as a minister, is there a link on this page that would direct them to an online application? 23 24 Α Yes.

Where is that?

Q

25

- 1 A There are three. I will start at the top.
- 2 The first being in the main navigation towards the --
- 3 towards the right side of the page. It says, apply
- 4 for ordination. Below that in the middle of the page,
- 5 there's a blue button with gold trim that says, apply
- 6 for ordination. And at the bottom of the page above
- 7 the footer is a gold button that says, apply for
- 8 ordination.
- 9 Q Okay. I'm now going to direct you back to
- 10 what was marked as Exhibit 56. And this is a document
- 11 that was titled AMM Home Page 20150314. Do you have
- 12 that open?
- 13 A Yes.
- 14 Q Are you able to relatively easily switch
- between this Exhibit 56 and the Exhibit 59 we just
- 16 looked at?
- 17 A Yes.
- 18 Q Does Exhibit 56 appear to be the online
- 19 application that a user would be directed to if they
- 20 clicked on the "apply for ordination" button shown in
- 21 Exhibit 59?
- 22 A Yes.
- 23 Q Okay. I'm going to direct you back to
- 24 Exhibit 50, which is the document with the file name
- 25 AMM Home Page 20110208. Let me know when you have

- 1 that open, please.
- 2 A I have that open.
- 3 Q Can you point me to the words "get ordained"
- 4 on this page?
- 5 A I don't believe I see that on this page.
- 6 Q I will direct you to Exhibit 51, which is
- 7 the file with the name AMM Home Page 20110612. Will
- 8 you please let me know when you have that open?
- 9 A Yes. It's open.
- 10 Q Do you see the words "get ordained" anywhere
- 11 on this page?
- 12 A No.
- 13 Q I am now going to direct you to Exhibit 52,
- 14 which is the document with the file name AMM Home Page
- 15 20140520. Will you please let me know when you have
- 16 that open?
- 17 A Yes.
- 18 Q Do you see the words "get ordained" anywhere
- 19 on this page?
- 20 A No.
- 21 Q I'm going to direct you to Exhibit 53, which
- is the document titled AMM Home Page 20140625. Will
- 23 you please let me know if you see the words "get
- 24 ordained" anywhere on this page?
- 25 A I do not see it.

- 1 Q I will direct you to Exhibit 54, which is
- 2 the document titled AMM Home Page 20150314. Sorry. I
- 3 may have misled you there. Let me make sure I have
- 4 this correct. Sorry. I'm going to direct you to
- 5 Exhibit 54, which is the document titled AMM
- 6 Application 20140625. Please let me know when you
- 7 have that open.
- 8 A I have it open.
- 9 Q Can you point me to the words "get ordained"
- 10 anywhere on that page?
- 11 A It is not on this page.
- 12 Q I will now direct your attention to Exhibit
- 13 55, which is the document titled AMM Store 20140625.
- 14 Please let me know when you have that open.
- 15 A It's open.
- 16 Q Do you see the words "get ordained" anywhere
- 17 on this page?
- 18 A No.
- 19 Q I am now going to direct your attention to
- 20 Exhibit 59, which is the exhibit I sent that was
- 21 mistakenly titled Exhibit 60 when I first sent it.
- 22 Will you please let me know when you have that open?
- 23 A It's open.
- 24 Q Do you see the words "get ordained" anywhere
- 25 on this page?

- 1 A I do not.
- 2 Q I am now going to direct your attention to
- 3 Exhibit 56, which is the document that was titled, AMM
- 4 Home Page 20150314. Please let me know when you have
- 5 that open.
- 6 A I have that open.
- 7 Q Can you point me to the words "get ordained"
- 8 anywhere on this page?
- 9 A "Get ordained" is not on this page.
- 10 Q I will now direct you to Exhibit 57, which
- is the document file named AMM Store 20160402. Will
- 12 you please let me know when you have that open?
- 13 A I have it open.
- 14 Q Can you please point me to the words "get
- ordained" anywhere on this page?
- 16 A I cannot.
- 17 Q I will now direct your attention to the
- 18 document -- excuse me -- to Exhibit 58, which is the
- document titled AMM Home Page 20180114 -- sorry, 04.
- 20 I'll state that again for clarity. AMM Home Page
- 21 20180104. Will you please let me know when you have
- 22 that open?
- 23 A It's open.
- 24 Q Can you point me to the words "get ordained"
- 25 anywhere on this page?

- 1 A I cannot.
- 2 Q Could we take maybe a five- or ten-minute
- 3 break and then come back?
- 4 A That works for me.
- 5 MR. HODGES: That works for me.
- 6 MR. MATESKY: Let's take ten.
- 7 (Recess taken.)
- 8 Q Mr. Yoshioka, do you have a good
- 9 understanding of how the words "get ordained" are used
- 10 by other organizations that provide online ordination
- 11 services? I think you are muted.
- 12 A Yes.
- 13 Q Do you keep track of how other organizations
- in the field use the words "get ordained"?
- 15 A Yes.
- 16 Q How do you do that?
- 17 A I do that in several different ways. I do
- 18 that in several different ways.
- 19 Q Can you explain those ways, please?
- 20 A Yes. One is to directly visit those
- 21 websites and to read the content and to go through it
- 22 myself. Another is to use Google search and see what
- 23 that pulls up. And another way would be to use
- 24 various different tools that allow you to analyze
- 25 websites in terms of the language they use and how

- 1 prevalent certain words or phrases are on those
- 2 websites.
- 3 Q Why would you engage in those actions?
- 4 Excuse me. Why have you engaged in those actions?
- 5 A I have engaged in those actions because it
- 6 directly affects AMM as an organization. AMM operates
- 7 in the space of ordaining people. And therefore, it
- 8 is incumbent upon AMM as an organization to understand
- 9 as best as possible what everyone else is doing in
- 10 that same space to help us strategize and to position
- 11 ourselves with respect to other organizations.
- 12 Q Is that true only because AMM has initiated
- this opposition proceeding against ULC Monastery?
- 14 A No.
- 15 Q Did AMM keep track of third party uses of
- 16 the words "get ordained" before this opposition
- 17 proceeding was initiated?
- 18 A Part of my job at AMM is to understand and
- 19 to better position AMM as an organization when it
- 20 comes to the language we use on our website. And part
- 21 of that is to have an understanding of what the
- 22 organization -- what the other organizations are
- 23 doing, not just in terms of the phrase "get ordained",
- 24 but in terms of any type of language that would be
- 25 used in this industry.

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- 1 Q I'm not sure if that answered my question.
- 2 I guess I'll move to strike as nonresponsive to the
- 3 extent it didn't answer my question.
- 4 I'll ask a different question. Did AMM
- 5 review the use of "get ordained", the words "get
- 6 ordained" by third parties prior to 2020?
- 7 A Yes.
- 8 Q Did it do so using the three methods you
- 9 described?
- 10 A Yes.
- 11 Q Did AMM review third party use of the words
- 12 "get ordained" prior to 2019?
- 13 A Yes.
- 14 Q Did it do so using the three methods you
- 15 described?
- 16 A Yes.
- 17 Q Did AMM review third party use of the words
- 18 "get ordained" prior to 2018?
- 19 A Yes.
- 20 Q Did it do so using the three methods you
- 21 described?
- 22 A Yes.
- 23 Q Does AMM regularly review the content of
- 24 third party websites that offer ecclesiastical
- 25 services such as ordaining ministers?

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- 1 A Yes.
- 2 Q Does AMM regularly review Google search
- 3 results for terms that it finds important?
- 4 A Yes.
- 5 Q Has AMM regularly reviewed Google search
- 6 results for the phrase "get ordained"?
- 7 A Yes.
- 8 Q Has AMM regularly reviewed Google Trends
- 9 search results for the phrase "get ordained"?
- 10 A I don't know, but I believe so. It wouldn't
- 11 have been me that did that specific function though.
- 12 Q How long have you -- let me strike that.
- 13 How long have you been familiar with the organization
- 14 Open Ministry?
- 15 A I have known about them since probably late
- 16 2009 to sometime in 2010.
- 17 Q Has AMM regularly reviewed the content of
- 18 the Open Ministry website?
- MR. HODGES: Object to form.
- 20 A Yeah. I don't know about regularly as far
- 21 as a fixed schedule, but I certainly visit that
- 22 website every few weeks.
- 23 Q Is the Open Ministry website one of the
- 24 websites for which AMM has reviewed use of the words
- 25 "get ordained" over the years?

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1 A Yes.

- 2 Q Approximately when did you first become
- 3 aware of Christian Leaders Institute?
- 4 A I don't know.
- 5 Q Did you become aware of Christian Leaders
- 6 Institute before 2020?
- 7 A I don't know.
- 8 Q When did you first become aware of the
- 9 Church of the Latter Day Dude?
- 10 A I first became aware of the Church of the
- 11 Latter Day Dude several years ago. It could have well
- 12 possibly been prior to 2009 if they existed back then.
- 13 I really can't say other than I -- I can say with
- 14 certainty I've known about them for at least six
- 15 years. That would be like 2014. But I can't recall
- 16 exactly when I learned about them.
- 17 O I'll clarify. When I use -- if I use the
- 18 word, regularly, I don't necessarily mean on a fixed
- 19 schedule. But is the website for the Church of the
- 20 Latter Day Dude one of the websites that AMM would
- 21 regularly review over the years?
- 22 A Yes.
- 23 Q Is the website for the Church of the Latter
- 24 Day Dude one of the websites for which AMM has
- 25 reviewed for use of the words "get ordained" over the

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- 1 years?
- 2 A Yes.
- 3 Q Do you recall -- never mind. Strike that.
- When did you first become aware of First
- 5 Nation Church?
- 6 MR. HODGES: Object to form.
- 7 A I can't say specifically, but I've known
- 8 about them for several years.
- 9 O Is the website for First Nation Church one
- 10 that AMM has regularly reviewed over the years?
- MR. HODGES: Object to form.
- 12 A Yes.
- 13 O Is the website for First Nation Church one
- 14 for which AMM has reviewed use of the words "get
- ordained" over the years?
- 16 A Yes.
- 17 Q Are you aware of an organization called
- 18 Wanderlust Bay?
- 19 A Yes.
- 20 Q When did you first become aware of
- 21 Wanderlust Bay?
- 22 A That would have been relatively -- can you
- 23 still hear me? The Zoom cut out, but I assume we
- 24 still have audio.
- 25 Q Yeah. You're frozen on screen, but I can

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- 1 hear you.
- 2 A Okay. I am restarting my Zoom, but I can
- 3 continue to answer that question while we're doing
- 4 that, if that works for you. Otherwise I can just
- 5 wait until this thing gets working again.
- 6 Q For now let's keep going. I'll ask the
- 7 question again just so we have a clear record.
- 8 A Appreciate it.
- 9 Q When did you first become aware of
- 10 Wanderlust Bay?
- 11 A That would have been one of the more recent
- 12 ones I learned about. Probably in the past year or
- 13 two.
- 14 Q When do you first recall reviewing the
- website for Wanderlust Bay?
- 16 A That would have been within the past year.
- 17 Q Do you recall reviewing the website for
- 18 Wanderlust Bay in late August or early September of
- 19 this year?
- 20 A Yes.
- 21 Q Was that the first time you reviewed the
- 22 website for Wanderlust Bay?
- 23 A No.
- 24 Q Are you aware of an organization called
- 25 Church of the Open Road?

Ten Toshioka December 7, 2020

- 1 A Yes.
- 2 Q When did you first become aware of Church of
- 3 the Open Road?
- 4 A That one is also another relatively new
- 5 organization. It would have been within the past two
- 6 years.
- 7 Q When do you first recall reviewing the
- 8 website of Church of the Open Road?
- 9 A That would have been when I first learned
- 10 about them, which would have been within the past two
- 11 years. I do know that they're not that old. They
- 12 can't be more than three years old. They're probably
- 13 about two years old. And I would have reviewed them
- 14 when I found out about them initially.
- 15 Q To the best of your recollection, do you
- 16 believe you first reviewed their website prior to
- 17 2020?
- 18 A Yes.
- 19 Q Is that an organization for which AMM has
- 20 reviewed the website for use of the words "get
- 21 ordained"?
- 22 A Yes.
- 23 Q And when was that review first conducted to
- 24 the best of your recollection?
- 25 A It would have been the first time I heard

- 1 about them, which was about -- I believe it was about
- 2 two years ago. And whenever I find out about a new
- 3 organization, I attempt to spend some time poking
- 4 around and seeing what they're about.
- 5 Q Are you aware of an organization called
- 6 Minister Now?
- 7 A Yes.
- 8 Q When did you first become aware of Minister
- 9 Now?
- 10 A That one is hard to say because there are
- 11 several organizations that have very similar sounding
- 12 interchangeable names that they themselves change
- 13 their names or the URLs, and it's hard to pinpoint if
- 14 it's the same organization. And Minister Now
- 15 specifically, you know, I'm not sure if they called
- 16 themselves something different beforehand. So it's
- 17 hard for me to answer that one with any type of degree
- 18 of certainty.
- 19 Q Do you recall reviewing the website for
- 20 Minister Now in late August, early September of this
- 21 year?
- 22 A Yes.
- 23 Q Was that the first time you reviewed the
- 24 website for Minister Now?
- 25 A No.

- 1 Q Was that the first time you reviewed the
- 2 website for Minister Now for use of the words "get
- 3 ordained"?
- 4 A No.
- 5 Q Do you recall reviewing the website for
- 6 Minister Now prior to 2020?
- 7 A Again, I'm not sure because that's one of
- 8 the more slippery organizations that's hard for me to
- 9 keep track of who actually -- basically, it's hard to
- 10 keep track whether it was the same organization as it
- 11 was called three years ago. Some of these people tend
- 12 to change their URLs and the name of the organization.
- 13 So I could have. It may have been under a different
- 14 name. I hope that -- I hope that answers your
- 15 question. That's the best I can give you.
- 16 Q Are you aware of an organization that goes
- 17 by the name Universal Ministries?
- 18 A Yes.
- 19 Q When did you first become aware of Universal
- 20 Ministries?
- 21 A That one has been around for longer. It's
- 22 been several years, certainly prior to 2018. Probably
- 23 prior to 2016. I think they existed even, you know,
- even as far back as 2011. I can't say with certainty,
- 25 but I recall that's one that I have visited over the

- 1 years going pretty far back.
- 2 Q And is that an organization whose website
- 3 you have reviewed -- sorry. Sorry. Let me start that
- 4 over just to clarify and make sure I understood your
- 5 last answer. Is it accurate to say that that is an
- 6 organization whose website you have reviewed over the
- 7 years?
- 8 A Yes.
- 9 Q Okay. Is it accurate to say that's an
- 10 organization whose website you have reviewed for use
- of the words "get ordained" over the years?
- 12 A Yes.
- 13 Q Do you recall approximately when you first
- 14 reviewed Universal Ministries' website for use of the
- words "get ordained"?
- 16 A Can you repeat your question? I apologize.
- 17 I totally spaced.
- 18 Q Sure. Can you recall approximately when you
- 19 first reviewed the Universal Ministries website for
- 20 use of the words "get ordained"?
- 21 A I would have reviewed it for that term or
- 22 that phrase and others when I first learned about
- 23 them. And that would have been many years ago.
- 24 Q Are you familiar with an organization called
- 25 United National Ministries?

- 1 A Yes.
- 2 Q When did you first become aware of United
- 3 National Ministries?
- 4 A That's another organization that is hard to
- 5 pin down. I even confuse that one with First Nation
- 6 Ministry. I think you mentioned that in one of the
- 7 other questions. They kind of all operate in kind of
- 8 the same kind of name space, and it's confusing
- 9 distinguishing them. So it's hard to say because it's
- 10 also another one that I believe they've changed their
- 11 name or rebranded. So I can't say with certainty
- 12 other than I'm pretty certain that they have been
- 13 around for at least the past five years.
- I've certainly -- I know that more than two
- 15 years ago, I've known about them, and I've gone to
- 16 their website, and probably before that. But, again,
- 17 I just want to add the caveat that there's several of
- 18 these organizations that kind of occupy the same space
- in my head. And it's hard for me to distinguish
- 20 between them just pulling it from memory.
- 21 Q And when you first reviewed the website for
- 22 United National Ministry, did you review it for use of
- 23 the words "get ordained"?
- 24 A Yes. That and others.
- 25 Q Are you familiar with an organization called

- 1 The Church of Bacon?
- 2 A Yes.
- 3 Q When did you first become aware of The
- 4 Church of Bacon?
- 5 A That would have been within the past two
- 6 years.
- 7 Q Do you believe you became aware of The
- 8 Church of Bacon prior to 2020?
- 9 A I don't know.
- 10 Q Do you recall reviewing the website for The
- 11 Church of Bacon in late August, early September of
- 12 this year?
- 13 A Yes.
- 14 Q Was that the first time you reviewed the
- 15 website for The Church of Bacon?
- 16 A It wouldn't have been the first time. I
- 17 knew about them before that. But it's one of the
- 18 websites I don't check up on as much. I find them
- 19 mostly amusing, but it was not the first time I looked
- 20 at that website.
- 21 Q Was that the first time you reviewed that
- 22 website for use of the words "get ordained"?
- 23 A No. It would have been when I first found
- 24 out about them.
- 25 Q Do you recall performing a review of ten

- 1 websites for use of the words "get ordained" in late
- 2 August, early September of this year?
- 3 A Yes.
- 4 Q How did you choose which websites to include
- 5 in that review?
- 6 A It was a few months ago. But I believe the
- 7 process was simply going to Google and typing in "get
- 8 ordained" and seeing what Google served me.
- 9 Q So when you review the websites of third
- 10 party organizations that offer ecclesiastical services
- 11 such as online ordination services, do you communicate
- what you learn to other members of AMM?
- 13 A It depends. I probably don't communicate
- 14 everything. And I don't share that information with
- 15 everyone, but I communicate what I believe are the
- 16 salient, important facts to the people that should
- 17 know about that stuff.
- 18 Q How do you do that?
- 19 A I can't say that I have a hard and fast
- 20 bullet pointed codified process. It's usually I'll go
- 21 to the website. And to clarify, I'm not just looking
- 22 for the usage of "get ordained". I'm really taking a
- 23 holistic approach. So I look at the website as a
- 24 whole, what type of language they're using. And "get
- 25 ordained" is a subset of that. How their website is

- 1 structured, what the meta info is, things like that.
- 2 And then I relay that information to the people that
- 3 can make use of that information.
- So, say, if I'm communicating with an
- 5 advertising consultant, then I'll share with them my
- 6 findings that I believe will be helpful. But
- 7 obviously, I won't share things that aren't useful to
- 8 them. And on the other hand, I might share other
- 9 pieces of information I learned with certain AMM staff
- 10 to make other decisions that that information could
- 11 affect.
- 12 Q I'm going to strike the -- move to strike
- 13 the answer as nonresponsive because I'm not asking
- 14 whether you would share or what you would share.
- 15 Through what method would you share what you learned?
- 16 And I'll clarify. I'll try to make it easier. Do you
- 17 share this information orally on the telephone? Do
- 18 you share this in an email? How would you share this
- information to others at AMM that you learned through
- 20 this review?
- 21 A That really all depends on any given -- on
- 22 how I -- that would depend on just what's going on
- 23 that day. It may be that I have a conversation with
- 24 someone. It may be over the phone. It may be through
- 25 email or some other communications channel. It really

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- 1 just depends.
- 2 Q Have you recorded examples of third party
- 3 web pages to share with others at AMM?
- 4 A Occasionally, yes.
- 5 Q Have you recorded examples of Google search
- 6 results for terms such as "get ordained" to share with
- 7 others at AMM?
- 8 A On occasion, yes.
- 9 Q I believe the third category of review you
- 10 mentioned was using analytics tools. I'm not trying
- 11 to mischaracterize your testimony. But could you
- 12 explain in more detail what that third category you
- 13 referred to was?
- 14 A Yeah. That third category was basically
- 15 meant to encompass any third party software or
- 16 platform that we could use to learn more information
- 17 about other organizations. So I can't rattle them all
- off on the top of my head because there's a lot that
- 19 have changed over the years. But I basically meant to
- 20 say -- that category is basically for tools like
- 21 Google analytics. Or another one that I use that I
- 22 mentioned before is Google Search Console. But there
- 23 are others, and it just all depends on what's
- 24 available at the time.
- MR. MATESKY: Could we take a five-minute

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- 1 break?
- 2 (Recess taken.)
- 3 MR. MATESKY: We don't have any further
- 4 questions.
- 5 MR. HODGES: I'm going to actually have just
- 6 a couple cross questions. And to start off with, at
- 7 least state on the record that we're going to do some
- 8 cross, but it's subject to reserving our rights to
- 9 object to any of the direct that was outside the scope
- 10 of the pretrial disclosures.
- 11 EXAMINATION
- 12 BY MR. HODGES:
- 13 Q But with that, Glen, you looked at a bunch
- 14 of things earlier today that were -- you identified as
- 15 screenshots of various AMM web pages. Do you remember
- 16 that?
- 17 A Yes.
- 18 Q Were there -- or are there other pages to
- 19 the AMM website other than what you were shown?
- 20 A Yes.
- 21 Q Is that true for all the time periods that
- 22 you looked at today?
- 23 A Yes.
- 24 Q How often were changes made to the AMM
- 25 website during those time periods?

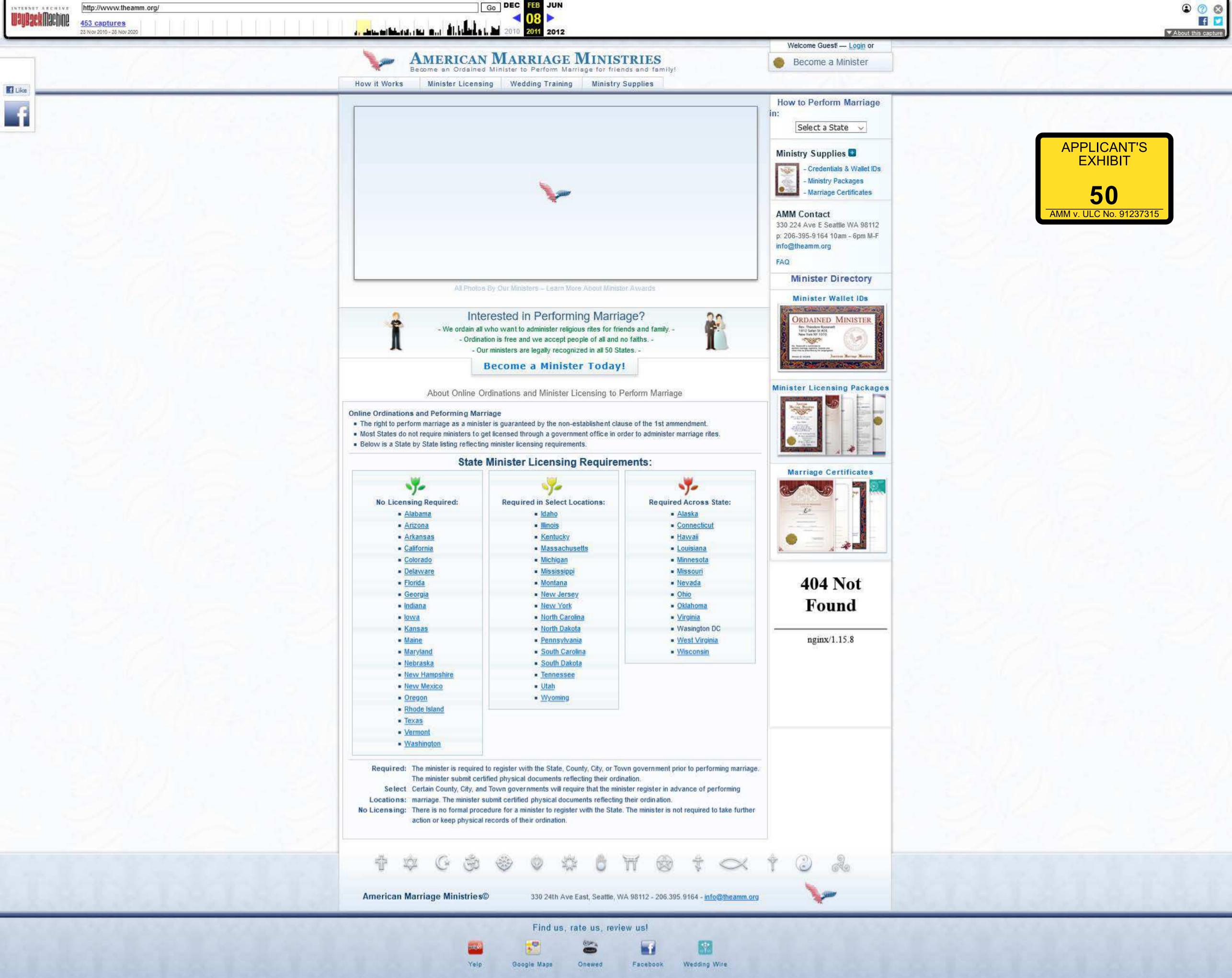
Page 51 It would depend on the time period, but the 1 website is updated regularly, usually on a weekly 2 basis, sometimes on a daily basis. Even looking at 3 those screenshots, you could see over the years how 4 5 much the website had changed. That would give an 6 indication of how much -- how dynamic the website is 7 and has been. 8 MR. HODGES: Okay. No further questions 9 from us. 10 MR. MATESKY: Nothing on redirect. MR. HODGES: As before, we'll have Glen read 11 12 and sign. THE COURT REPORTER: Are you ordering the 13 transcript, Mr. Matesky? 14 15 MR. MATESKY: Yes, we will. 16 THE COURT REPORTER: And copy, Mr. Hodges? 17 MR. HODGES: We will let you know. (Deposition adjourned at 3:30 p.m.) 18 19 (Signature was reserved.) 20 21 22 23 24 25

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Page 52
1
                        SIGNATURE
2
 3
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5
 6
              I declare under penalty of perjury under the
7
    laws of the State of Washington that I have read my
    within deposition, and the same is true and accurate,
8
 9
    save and except for changes and/or corrections, if any,
10
    as indicated by me on the CHANGE SHEET page hereof.
    Signed in _____, Washington on the _____
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    day of _____, 2020.
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                                 GLEN YOSHIOKA
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            December 7, 2020
24
    Taken:
    Case Name: AMM v. ULC
25
    Cause No.: 91237315
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Page 53 CERTIFICATE 1 2 State of Washington ) 3 ) SS. County of King 4 ) 5 6 I, the undersigned Registered Professional Reporter and Washington Certified Court Reporter, hereby 7 certify that the foregoing deposition upon Oral examination of GLEN YOSHIOKA was taken before me on December 7, 2020 and 8 transcribed under my direction; That the witness was duly sworn by me pursuant to 9 RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for, nor 10 a relative or employee of, any of the parties to the action or any attorney or counsel employed by the parties hereto, 11 nor financially interested in its outcome. 12 I further certify that in accordance with CR 13 30(e), the witness was given the opportunity to examine, read, and sign the deposition, within 30 days, upon its 14 completion and submission, unless waiver of signature was indicated in the record. 15 IN WITNESS WHEREOF, I have hereunto set my hand and seal this date, December 15, 2020: 16 17 18 19 20 21 /S/Yvonne A. Gillette 2.2 Yvonne A. Gillette 23 Washington Certified Court Reporter 24 License No. 2129 25

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24
                                   GLEN YOSHIOKA
25
     Taken: December 7, 2020
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1	DATE	FILED: L/8/COZ/
2		
3		MICHAEL MATESKY
4		Matesky Law 4500 9th Avenue NE
5		Suite 300 Seattle, WA 98105
6		
7		NOTICE RE CHANGES TO ORIGINAL DEPOSITION
8		
9		Case Name: AMM v. ULC
10		Venue: TTAB Cause No.: 91237315
11		Witness: GLEN YOSHIOKA Taken: December 7, 2020
12		
13		Pursuant to CR 30(e), the deposition transcript was
14		made available with Signature Page and Change Sheet to the above-referenced witness for examination,
15		reading, and signing.
1.6	_	Enclosed is a copy of the Signature Page and
17		Change Sheet, if any, to the above-referenced original deposition transcript.
18		
19	K	No Signature Page, corrections, or changes were
20		received by this office within the 30-day signature period.
21		
22		
23		Yvonne Gillette, CCR
24	cc:	File
25		MICHAEL MATESKY BENJAMIN HODGES



Required: The minister is required to register with the State, County, City, or Town government prior to performing marriage. The minister submit certified physical documents reflecting their ordination.

Select Certain County, City, and Town governments will require that the minister register in advance of performing

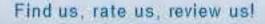
Locations: marriage. The minister submit certified physical documents reflecting their ordination.

No Licensing: There is no formal procedure for a minister to register with the State. The minister is not required to take further action or keep physical records of their ordination.



Like

330 24th Ave East, Seattle, WA 98112 - 206.395.9164 - info@theamm.org



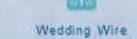


Yelp

















# Become an Ordained Minister

Officiate wedding ceremonies for family members, friends, and your community.

- We are a non-profit, interfaith church.
- Ordination is free, instant, and does not expire.
- Legally perform marriage anywhere in the country.

How it Works

Free Online Ordination!
First Name
Last Name
Email Address

Begin Ordination

APPLICANT'S EXHIBIT

51

AMM v. ULC No. 91237315

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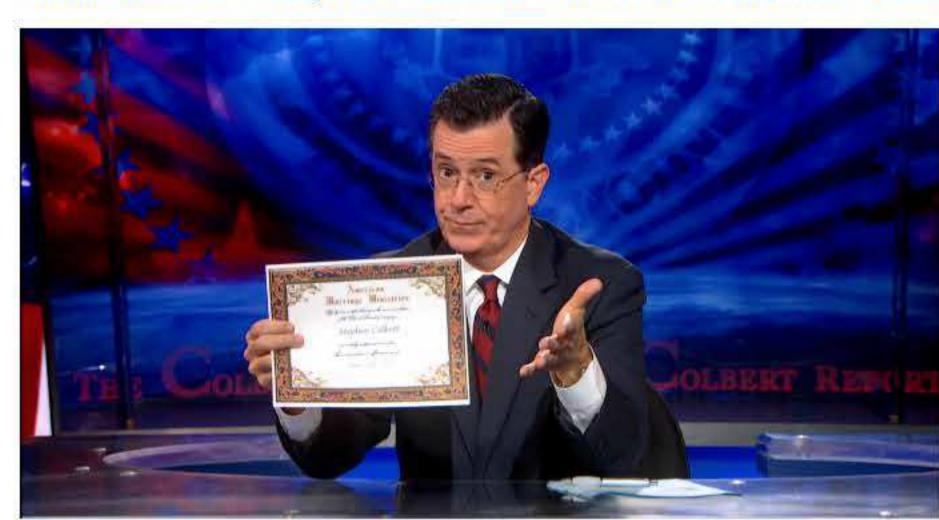
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# AMM Minister Stephen Colbert Performs Televised Wedding!

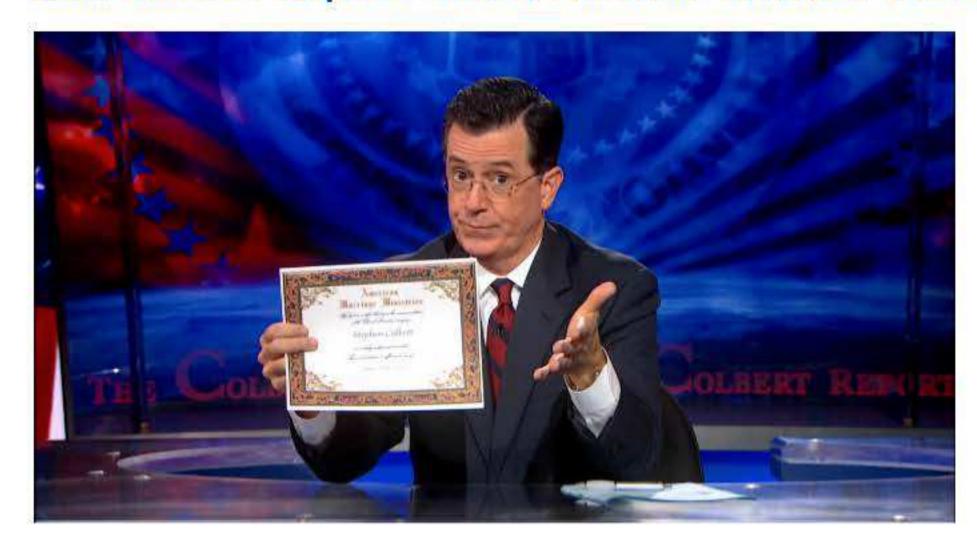


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**Y** Tweet



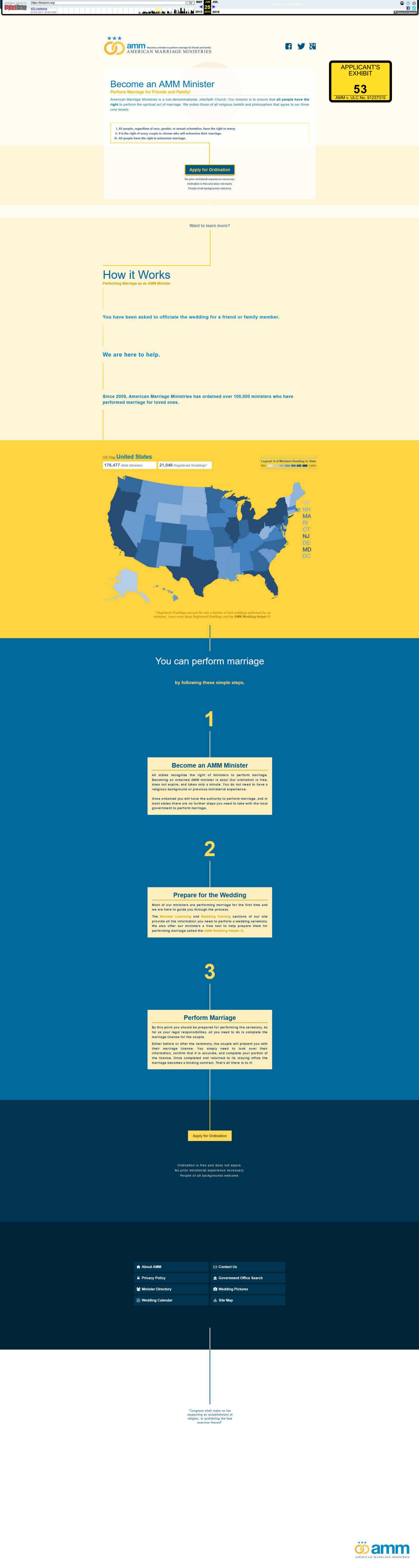
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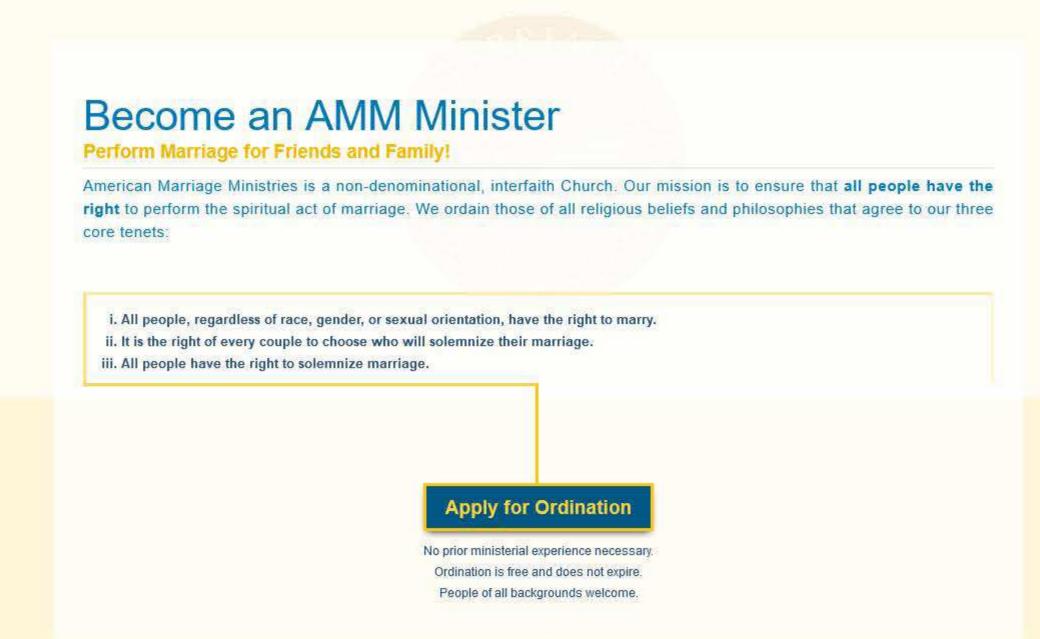
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Want to learn more?

# How it Works

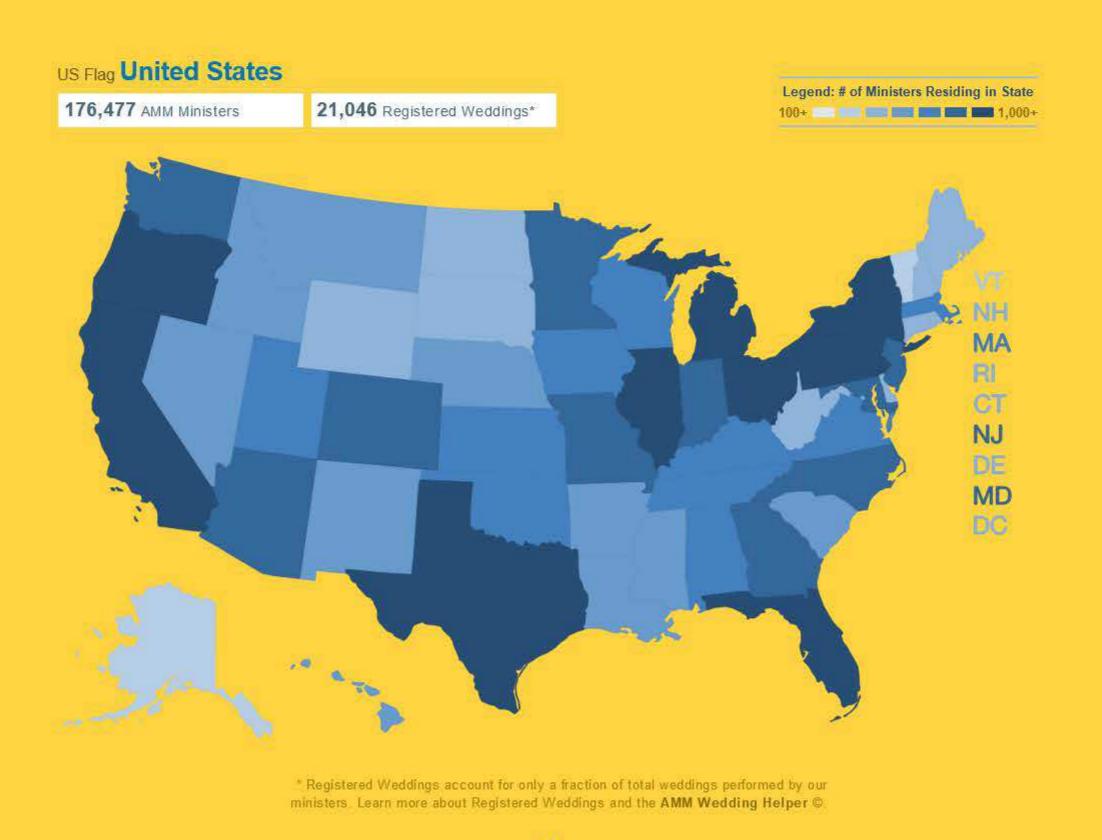
Performing Marriage as an AMM Minister

You have been asked to officiate the wedding for a friend or family member.

We are here to help.

Since 2009, American Marriage Ministries has ordained over 100,000 ministers who have

performed marriage for loved ones.



# You can perform marriage

by following these simple steps.

# **Become an AMM Minister**

All states recognize the right of ministers to perform marriage. Becoming an ordained AMM minister is easy! Our ordination is free, does not expire, and takes only a minute. You do not need to have a religious background or previous ministerial experience.

Once ordained you will have the authority to perform marriage, and in most states there are no further steps you need to take with the local government to perform marriage.

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No prior ministerial experience necessary. People of all backgrounds welcome.

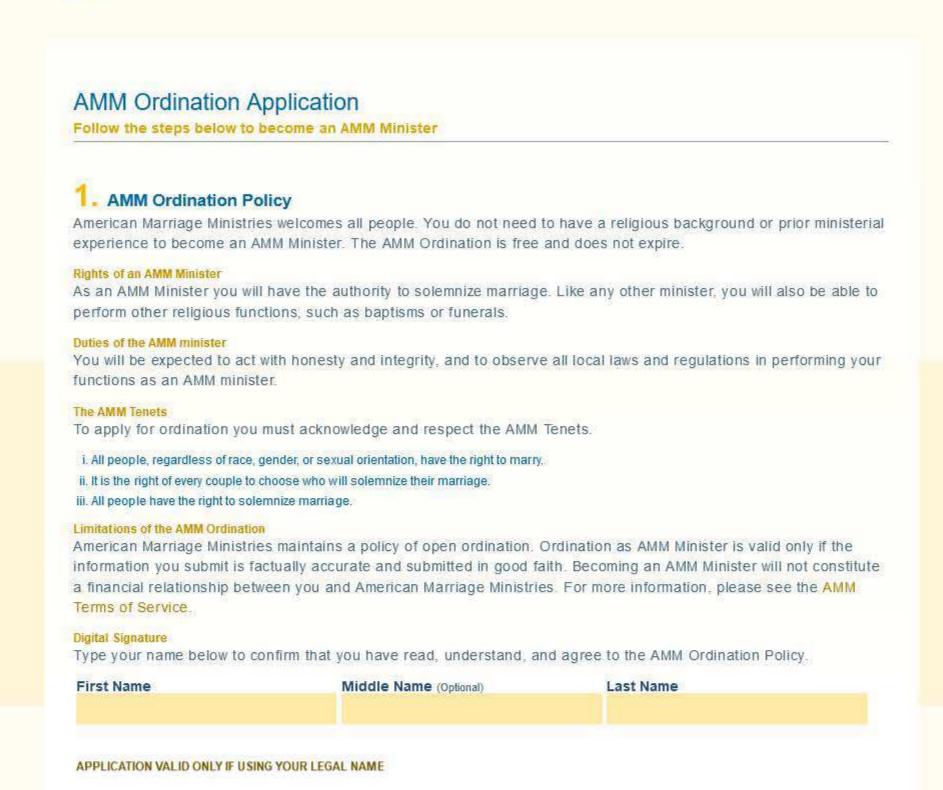
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> respecting an establishment of religion, or prohibiting the free exercise thereof"

"Congress shall make no law







APPLICANT'S EXHIBIT

54

AMM v. ULC No. 91237315

② ⑦ ③ F

2. Click to Continue

Trequest to become an AMM Minister

3. Complete the Form Date of Birth Day Year Month Gender (Select One) Street Address Zip/Postal Code Country **United States** City Select a State **Email Address** Confirm Email Address Password (4 Characters Minimum) Confirm Password

Submit Application



"Congress shall make no law respecting an establishment of religion, or

prohibiting the free exercise thereof"









2. Click to Continue

I request to become an AMM Minister



Submit Application



"Congress shall make no law respecting an establishment of religion, or

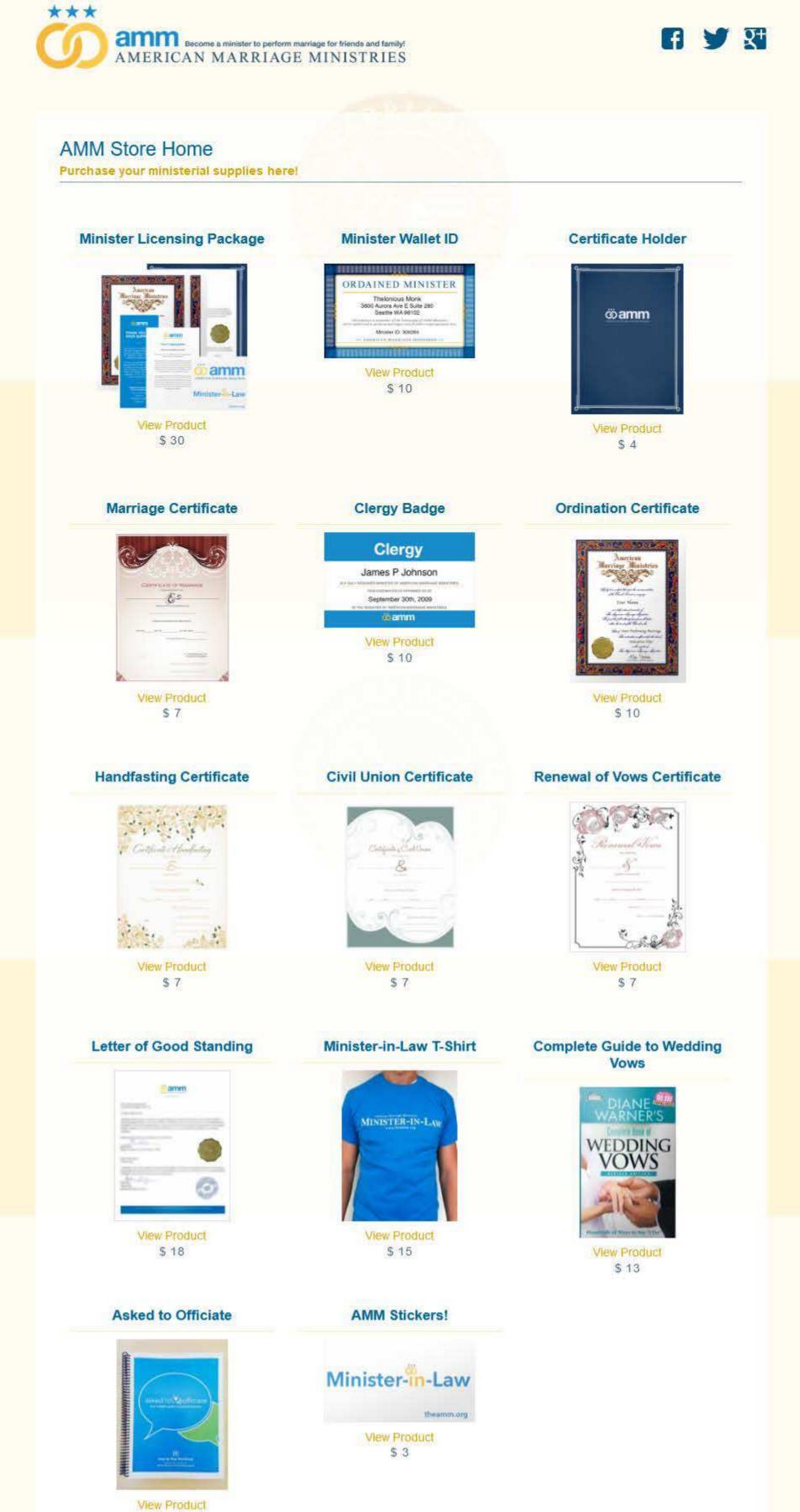
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APPLICANT'S EXHIBIT

AMM v. ULC No. 91237315



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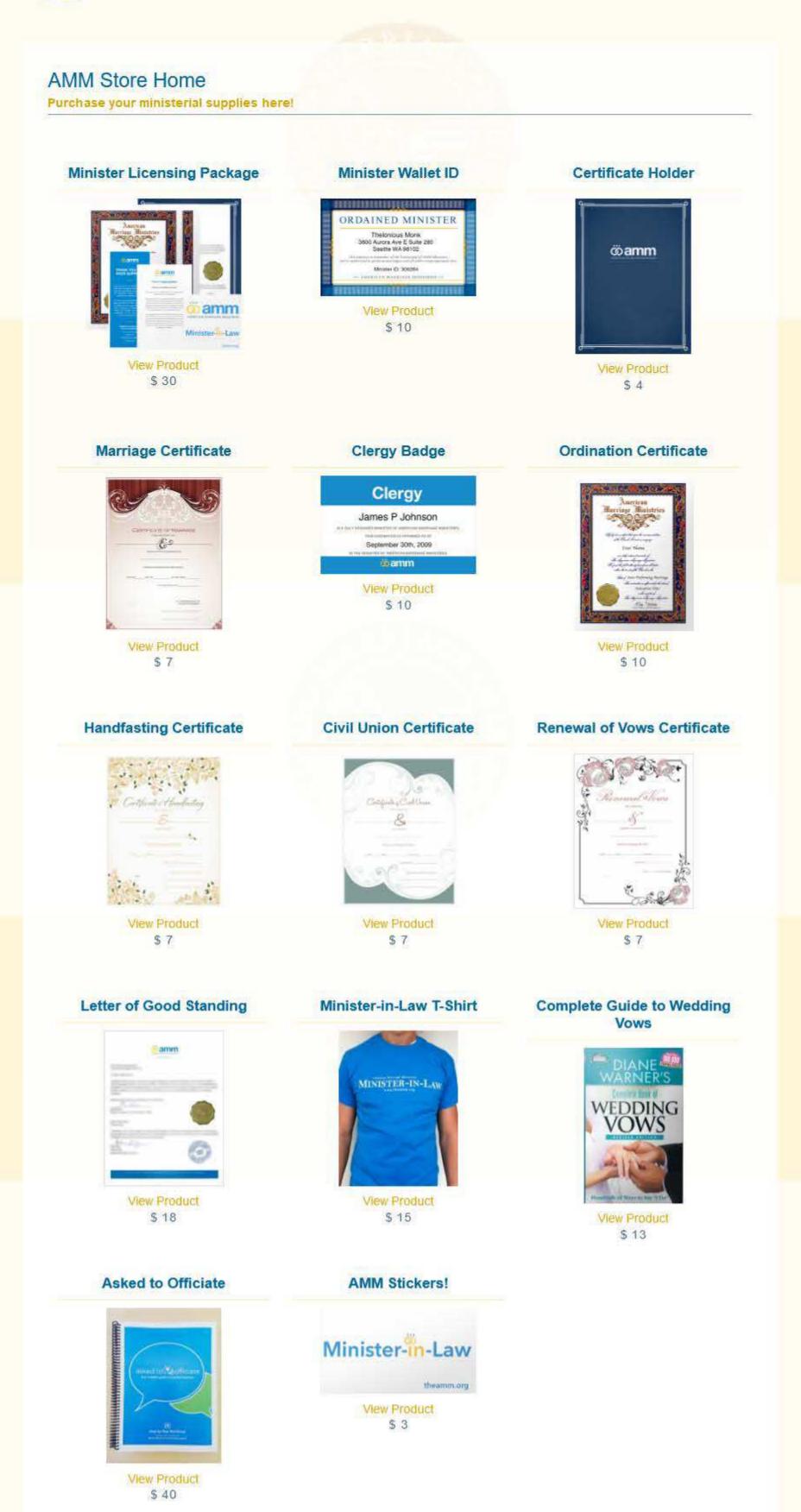
"Congress shall make no law respecting an establishment of religion, or

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APPLICANT'S EXHIBIT

56

AMM v. ULC No. 91237315

2. Click to Continue

APPLICATION VALID ONLY IF USING YOUR LEGAL NAME

☐ I request to become an AMM Certified Minister

3. Complete the Form Date of Birth Day Year Month Gender (Select One) Street Address Country Zip/Postal Code United States City Select a State **Email Address** Confirm Email Address Password (4 Characters Minimum) **Confirm Password** 

Submit Application

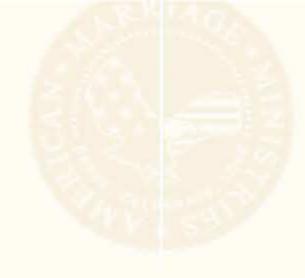












2. Click to Continue

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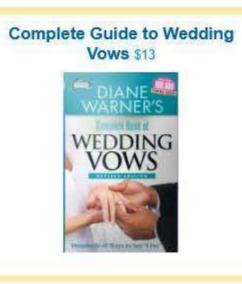
**APPLICANT'S EXHIBIT** AMM v. ULC No. 91237315







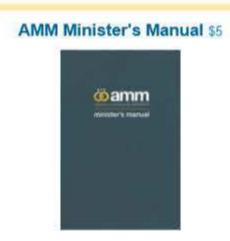


























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### Certificate Holder \$4



Complete Guide to Wedding



### Classic Wallet Card \$10



### Minister Wallet ID \$10



# Clergy Badge \$10



## **AMM Minister's Manual \$5**



### Asked to Officiate \$40



## Renewal of Vows Certificate \$7



# Handfasting Certificate \$7



## AMM Stickers! \$3



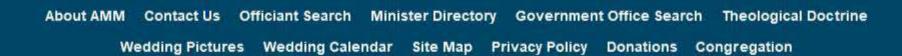
## Ordination Certificate \$10



# Letter of Good Standing \$18











# Become a Minister & Perform Marriage!

**Apply for Ordination** 

Free online ordination! Get ordained today to perform marriage for friends and family. Our spiritual mission is to ensure that all people have the right to perform marriage. Federally Recognized 501(c)3 Charitable Organization

Where will you be performing marriage/getting married?

Select Wedding State

### What We Believe

- 1. All people, regardless of race, gender, or sexual orientation, have the right to marry.
- 2. It is the right of every couple to choose who will solemnize their marriage.
- All people have the right to solemnize marriage.

# **How it Works**

### **Become an AMM Minister**

All states recognize the right of ministers to officiate weddings. Becoming ordained as an AMM Minister is easy! Free ordination does not expire, and the application is quick. You do not need to have a religious background or previous ministerial experience.

When you get ordained you will have the authority to perform marriage, and in most states there is no additional government registration required of ministers before performing marriage.

## Prepare for the Wedding

Most AMM Ministers are new to performing marriage, and we are here to guide you through the process.

The Minister Licensing and Wedding Training sections of our site provide all the information you need to perform a wedding ceremony. We also offer AMM Ministers a free tool to help prepare for performing marriage: the AMM Wedding Helper ©.

## **Perform Marriage!**

After preparing, you will be ready to perform the marriage. Conduct the ceremony as you planned and complete the marriage license with the couple.

Either before or after you officiate, the couple will present you with their marriage license. Look over the license, confirm that it is accurate, and complete the marriage officiant's section. Once completed and returned to its issuing office, the marriage is official. That's all there is to it!

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https://theamm.org/ ② ⑦ ③ F 453 captures APPLICANT'S EXHIBIT Become an AMM Minister Perform Marriage for Friends and Family! **59** American Marriage Ministries is a non-denominational, interfaith Church. Our mission is to ensure that all people have the right to perform the spiritual act of marriage. We ordain those of all religious beliefs and philosophies that agree AMM v. ULC No. 91237315 to our three core tenets: i. All people, regardless of race, gender, or sexual orientation, have the right to marry. ii. It is the right of every couple to choose who will solemnize their marriage. iii. All people have the right to solemnize marriage. **Apply for Ordination** No prior ministerial experience necessary. Ordination is free and does not expire. People of all backgrounds welcome. Want to learn more? If you have been asked to officiate the wedding for a friend or family member... We are here to help. Since 2009, American Marriage Ministries has ordained over 200,000 ministers so that they could legally perform marriage. United States Legend: # of Ministers Residing in State 218,395 AMM Ministers 30,636 Registered Weddings\* 100+ 1,000+ NJ DE MD DC \* Registered Weddings account for only a fraction of total weddings performed by our ministers. Learn more about Registered Weddings and the AMM Wedding Helper @ You can perform marriage by following these simple steps. **Become an AMM Minister** All states recognize the right of ministers to perform marriage. Becoming an ordained AMM minister is easy! Our ordination is free, does not expire, and takes only a minute. You do not need to have a religious background or previous ministerial experience. Once ordained you will have the authority to perform marriage, and in most states there are no further steps you need to take with the local government to perform marriage. Prepare for the Wedding Most of our ministers are performing marriage for the first time and we are here to guide you through the process. The Minister Licensing and Wedding Training sections of our site provide all the information you need to perform a wedding ceremony. We also offer our ministers a free tool to help prepare them for performing marriage called the AMM Wedding Helper ©. **Perform Marriage** By this point you should be prepared for performing the ceremony. As far as your legal responsibilites, all you need to do is complete the marriage license for the couple. Either before or after the ceremony, the couple will present you with their marriage license. You simply need to look over their information, confirm that it is accurate, and complete your portion of the license. Once completed and returned to its issuing office the marriage becomes a binding contract. That's all there is to it! Apply for Ordination Ordination is free and does not expire. No prior ministerial experience necessary.

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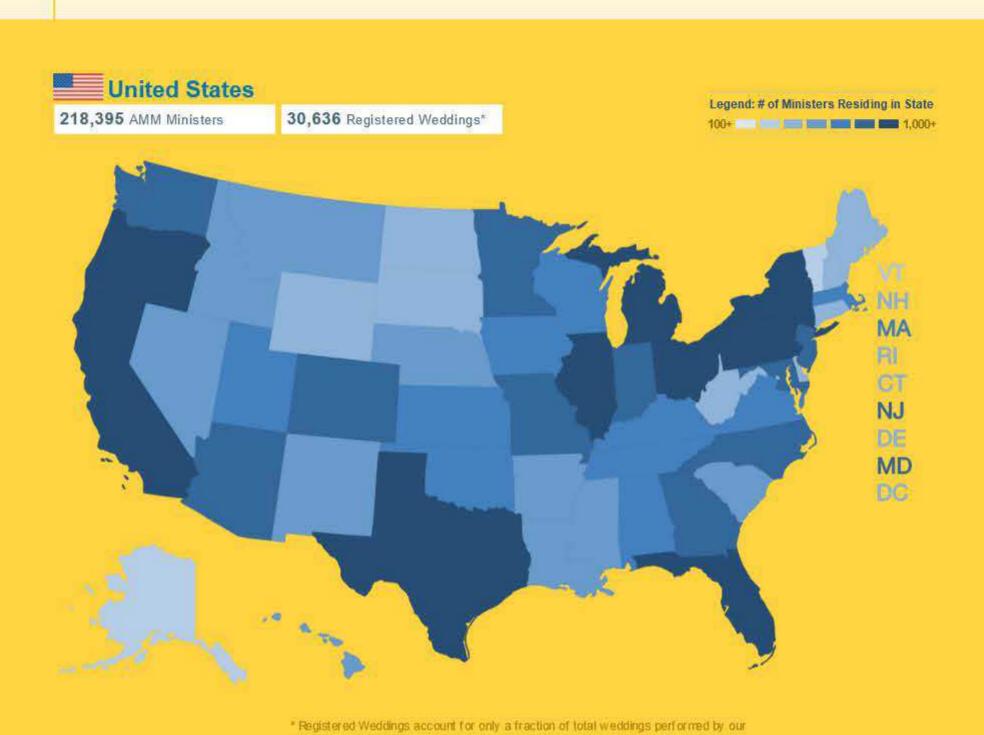
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